

# **EXHIBIT D**

Juan Carlos Felix, M.D.

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
3 CHARLESTON DIVISION  
4  
5 IN RE: ETHICON, INC., PELVIC )  
REPAIR SYSTEM PRODUCTS )  
6 LIABILITY LITIGATION, ) Master File No.  
 ) 2:12-MD-02327  
7 )  
THIS DOCUMENT RELATES TO: ) MDL No. 2327  
8 )  
Ruiz, Patricia v. Ethicon, ) JOSEPH R. GOODWIN  
9 Inc., et al. ) U.S. DISTRICT JUDGE  
 )  
10 Case No.: 2:12-cv-01021 )  
 )  
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16 DEPOSITION OF JUAN CARLOS FELIX, M.D.  
17 Monday, March 28, 2016  
18 Long Beach, California  
19  
20  
21 Reported By: Kristi Johnson, CSR 12585  
22  
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17 Deposition of JUAN CARLOS FELIX, M.D., taken on  
18 behalf of the Plaintiffs, before Kristi Johnson, CSR  
19 No. 12585, commencing on Monday, March 28, 2016, at  
20 11:55 a.m., at 111 East Ocean Boulevard, Long Beach,  
21 California, pursuant to Notice of Taking Deposition.

Juan Carlos Felix, M.D.

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Juan Carlos Felix, M.D.

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1           A.    Well, I neglected to mention in there that I  
2    have also reviewed the medical records.

3           Q.    But you didn't put it in your report that you  
4    had reviewed them; correct?

5           A.    You're correct.

6           MR. THOMAS: It's on his reliance list, though.

7           MR. AYLSTOCK: We have already established that  
8    his reliance list was created by counsel for Ethicon and  
9    is incomplete or inaccurate. I'm entitled to ask him  
10   questions about it.

11           MR. THOMAS: All right.

12   BY MR. AYLSTOCK:

13           Q.    The time slip reflects that the microscopy,  
14    routine and polarized, was done on March 20th for  
15    two hours.

16           Do you see that?

17           A.    Yes.

18           Q.    On the same date, there was a write-up of the  
19    micros.

20           Do you see that, for one hour?

21           A.    Yes.

22           Q.    Is there any separate writing of that -- of  
23    your findings, other than what's reflected in this  
24    report?

25           A.    No.

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1 correct?

2 MR. THOMAS: Object to form.

3 THE WITNESS: That is not true at all.

4 BY MR. AYLSTOCK:

5 Q. What is the most highly innervated?

6 A. The tongue is, by far, more highly innervated  
7 than the genital tract. Using the genital tract in  
8 general as one place is foolish because the cervix has  
9 hardly any innervation to it, whereas the clitoris has a  
10 tremendous amount of innervation to it. So generalizing  
11 the pelvic anatomy as being highly innervated is  
12 inaccurate and demonstrates a lack of knowledge of that  
13 area.

14 Q. With regard to Ms. Ruiz, you have no basis to  
15 disagree with her clinical presentation as described in  
16 her medical records; correct?

17 A. I do not.

18 Q. And you do not quarrel with the opinions of her  
19 clinicians as reflected in those medical records as to  
20 the likely source of her sequelae?

21 MR. THOMAS: Object to form.

22 THE WITNESS: Can you use more specifics?

23 BY MR. AYLSTOCK:

24 Q. Sure. You're not a urogynecologist?

25 A. I'm not.

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1 Q. You never implanted one of these devices?

2 A. I have not.

3 Q. As it relates to her particular medical care,  
4 you're not giving clinical opinions; correct?

5 A. You're correct.

6 Q. You don't have any basis to quarrel with her  
7 clinical presentation or the causes of her clinical  
8 presentation to those physicians?

9 MR. THOMAS: Object to form.

10 THE WITNESS: Correct.

11 BY MR. AYLSTOCK:

12 Q. Thank you. Let me just take a brief minute.

13 A. Sure.

14 Q. A couple of follow-ups.

15 To arrive at your opinions in this case, can  
16 you describe for the jury what your methodology was? How  
17 did you go about forming your opinions in this case?

18 A. I have a strong knowledge base in the medical  
19 literature regarding polypropylene, and specifically to  
20 polypropylene mesh used in suburethral sling procedures.

21 I have an intimate knowledge of the anatomy,  
22 microanatomy of the genital tract, and specifically in  
23 the region where a suburethral sling is placed. I have,  
24 again, intimate knowledge of the normal appearance of  
25 that region.